



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO IL 60604-3590

REPLY TO THE ATTENTION OF

03 DEC 2003

R-19J

Honorable Bob Taft
Governor of Ohio
Columbus, Ohio 43215-6117

Dear Governor Taft

Thank you for making recommendations on 8-hour ozone air quality designations. Pursuant to the Clean Air Act (CAA), the United States Environmental Protection Agency (EPA) is required to promulgate designations for new or revised standards, such as the 8-hour ozone standard. Earlier this year, we entered into a consent decree that requires us to promulgate 8-hour ozone designations by April 15, 2004.

We have reviewed the July 15, 2003, letter from Christopher Jones, Director, Ohio Environmental Protection Agency, submitting Ohio's recommendations. Consistent with section 107(d)(1) of the CAA, this letter is to inform you that, based upon the information contained in your letter, and in the absence of additional substantiation for your recommendations, EPA intends to make modifications to Ohio's recommended designations and boundaries. If you would like to provide additional information about the areas in question, please provide this information by February 6, 2004, so that we can continue to work with your office as we move forward to make final designations.

The CAA defines a nonattainment area as any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant. EPA guidance indicates that Ohio should use the larger of the Consolidated Metropolitan Statistical Area, Metropolitan Statistical Area, or the 1-hour ozone nonattainment area as the presumptive boundary for 8-hour ozone nonattainment areas. The guidance provides 11 factors that Ohio should consider in determining whether to modify the presumptive boundaries. We have reviewed your supporting information to modify the presumptive nonattainment areas

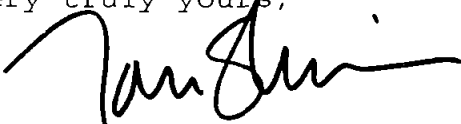
The enclosure to this letter identifies the counties that should be included in each nonattainment area. We are also providing a written summary of our reasoning for modifying your recommendations, explaining why we believe your recommendation is not consistent with the statutory definition of a nonattainment area in light of the 11 factors provided in our guidance.

EPA has been tracking preliminary 2003 ozone monitoring data and their impact on areas' preliminary 2001-2003 design values. Where preliminary 2001-2003 ozone monitoring data indicate that an area's attainment status will differ from Ohio's recommendation based on 2000-2002 monitoring data, EPA indicates the potential modification to the designation recommendation in the enclosure. Additionally, the EPA will continue to closely review monitoring data for additional differences that may have occurred throughout the remainder of the 2003 ozone season or as a result of data handling procedures to determine if it might affect the State's recommended designations. It is critical for Ohio to expedite submittal of 2003 monitoring data to EPA so that air quality designations and classifications for the 8-hour standard will accurately reflect the States's air quality.

To advance this process, please submit your final 2003 monitoring data into the Air Quality System as quickly as possible, if it has not already been done. In addition, please submit the 8-hour and 1-hour ozone design values and the average expected 1-hour exceedance rate to Stephen Rothblatt, of my staff, by official letter by December 17, 2003.

We look forward to a continued dialog with Ohio as we work to finalize the designations for the 8-hour ozone standard. We appreciate your efforts and will review any future supporting information Ohio wishes to submit on these recommendations. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Thomas V. Skinner
Regional Administrator

Enclosure

cc· Christopher Jones, Director
Ohio Environmental Protection Agency

John A. Benedict, Director
West Virginia Department of Environmental Protection

Joyce Epps, Director
Pennsylvania Department of Environmental Protection

Lori Kaplan, Commissioner
Indiana Department of Environmental Management

John Lyons, Air Director
Kentucky Department of Environmental Quality

Enclosure

The following table identifies the individual areas and Counties comprising those areas within Ohio that EPA intends to designate as nonattainment. Following the table is a description of areas where EPA intends to modify the Ohio recommendation and the basis for such modification. EPA intends to designate as attainment/unclassifiable all Counties not identified in the table below.

Area	Ohio Recommended Nonattainment Counties	EPA Recommended Nonattainment Counties
Canton-Massillon, OH	Stark	Stark
Cincinnati-Hamilton, OH-KI-IN	Butler Clermont Clinton Hamilton Warren	Butler Clermont Clinton Hamilton Warren
Cleveland-Akron, OH	Ashtabula Cuyahoga Geauga Lake Lorain Medina As a separate area: Portage Summit	Ashtabula Cuyahoga Geauga Lake Lorain Medina Portage Summit
Columbus, OH	Delaware Fairfield Franklin Licking Madison As a separate area: Knox	Delaware Fairfield Franklin Licking Madison Knox
Dayton-Springfield, OH	Clark Greene Miami Montgomery	Clark Greene Miami Montgomery

Huntington-Ashland, WV-KY-OH	Lawrence	Lawrence
Lima, OH	Allen	Allen
Parkersburg-Varietta, WV-OH	Washington	Washington
Steubenville-Weirton, OH-WV	Jefferson	Jefferson
Toledo, OH	Lucas Wood	Lucas Wood
Youngstown-Warren-Sharon, PA-OH	As a separate area from Mercer, PA: Mahoning Trumbull As a separate area: Columbiana	Mahoning Trumbull Columbiana
Wheeling, WV-OH	no Counties recommended	Belmont

Modifications to Ohio's Recommendations

Cincinnati-Hamilton, OH-KY-IN

Ohio EPA had not determined whether to include Clinton County with the Cincinnati-Hamilton nonattainment area but it is recommended as nonattainment. Clinton County is adjacent to the Cincinnati Consolidated Metropolitan Statistical Area (CMSA) and has a violating monitor. The Clinton County monitor appears to be an indicator of air quality for the nonattainment area because it is downwind from Cincinnati. We intend to include Clinton County in the Cincinnati-Hamilton nonattainment area.

Cleveland-Akron, OH

Ohio EPA recommended that the Akron area Counties of Portage and Summit, be designated as a separate nonattainment area from the Cleveland nonattainment area. We intend to modify the State's recommendation. We believe that area should be treated as one Cleveland-Akron nonattainment area. These two Counties are part of the CMSA and part of the nonattainment area under the 1-hour ozone standard. The Ohio EPA provided no technical justification or analysis to support creating separate nonattainment areas.

Columbus, OH
Knox County

Ohio EPA recommended that Knox County be considered a separate nonattainment area to the Columbus nonattainment area. Knox County is an adjacent County to the Columbus CMSA and it contains a violating monitor that appears to be a receptor for air quality in the CMSA because it is downwind from Columbus. We believe they should be treated as one nonattainment area. The Ohio EPA provided no technical justification or analysis to indicate a basis for creating a separate nonattainment area. We intend to include Knox County in the Columbus nonattainment area.

Wheeling, WV-OH
Belmont County

Ohio EPA recommended that Belmont County be attainment even though it is within the presumptive area, which contains monitors that are violating the standard. There is no monitor in Belmont County. We intend to modify the State's recommendation to include Belmont County in the Wheeling, WV-OH nonattainment area. This was done because the County is within the presumptive nonattainment area and it has significant emissions and population for that particular nonattainment area. Belmont County accounts for a large portion of the emissions and population within the Wheeling CMSA. The other Counties within the Wheeling CMSA, Ohio and Marshall, West Virginia are also intended to be designated as nonattainment. Belmont County is within the presumptive boundary and the State did not present a compelling argument to exclude this County.

Youngstown-Warren-Sharon, PA-OH

Ohio EPA recommended that Trumbull, Mahoning and Columbiana Counties in Ohio not be designated as part of the same nonattainment area as Mercer County, Pennsylvania. Ohio EPA also recommended that Columbiana County be designated as a separate nonattainment area from Trumbull and Mahoning Counties. We intend to modify the State's recommendation. EPA guidance provides that the presumptive boundary is the larger of the CMSA or the 1-hour boundary. The old 1-hour boundary included Trumbull and Mahoning Counties in Ohio as well as Mercer County, PA. We believe that Trumbull, Mahoning and Columbiana Counties in Ohio and Mercer County in Pennsylvania should be treated as one nonattainment area. Ohio EPA provided no technical justification or analysis to designate these Counties as separate nonattainment areas. We intend to include Trumbull, Mahoning, Columbiana and Mercer Counties in the Youngstown-Warren-Sharon, PA-OH nonattainment area.